

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SPRINGFIELD WATER AND SEWER)	
COMMISSION, Plaintiff)	
)	
v.)	CIVIL ACTION NO. 21-cv-30096-KAR
)	
ACE AMERICAN INSURANCE COMPANY,)	
Defendant)	

JOINT SCHEDULING CONFERENCE STATEMENT

Pursuant to Local Rule 16.1(D), counsel for the parties have conferred and now submit this Joint Scheduling Conference Statement in anticipation of the Scheduling Conference set for January 26, 2022.

A. Nature of Action

The Plaintiff was insured by a first party property insurance policy by the Defendant. On September 23, 2019, the Plaintiff had a catastrophic failure of a newly installed plunger valve at West Parish Filters in Granville, MA. The issues in this case are what damages and expenses the Plaintiff has incurred due to the loss, and the application of the coverages and provisions in Defendant's policy to pay for the damages and expenses.

B. Proposed Pretrial Schedule

The matter was initially commenced in Hampden County Superior Court on July 13, 2017. The case was removed to Federal District Court by the Defendant on September 27, 2021, and the complaint was answered on December 21, 2021. Counsel accordingly propose the following

pretrial schedule:

1. AMENDMENT OF PLEADINGS to be complete by: April 1, 2022;
 2. INITIAL DISCLOSURES required by Fed. R. Civ. P. 26(a)(1) to be completed by:
March 1, 2022.
 3. FACT DISCOVERY, including service of and responses to written discovery, and the
scheduling and taking of all depositions, to be completed by: December 31, 2022;
 4. EXPERT DISCOVERY
 - a. Plaintiff's trial experts designated and information required by Fed. R. Civ.
P. 26(a)(2) disclosed by: February 15, 2023;
 - b. Defendant's trial experts designated and information required by Fed. R.
Civ. P. 26(a)(2) disclosed by: April 1, 2023;
 - c. Expert depositions concluded by: June 1, 2023.
 5. DISPOSITIVE MOTIONS
 - a. Dispositive motions filed by: July 1, 2023
 - b. Oppositions to dispositive motions filed by: August 1, 2023;
 6. CASE MANAGEMENT AND PRETRIAL CONFERENCES on dates to be determined
by the Court.
- C. Certifications
- The parties have previously filed their compliance certifications with the Court pursuant

to Local Rule 16.1(D)(3).

SPRINGFIELD WATER AND SEWER COMMISSION,
Plaintiff

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ACE AMERICAN INSURANCE COMPANY,
Defendant

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CERTIFICATE OF SERVICE

I certify that a true copy of the within document was filed through the ECF system and will be sent electronically to the registered participants as identified on the notice of electronic filing and paper copies will be sent to those indicated as non-registered participants on January 24, 2022.

/s/ John B. Stewart
JOHN B. STEWART